

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

IN RE: William Neville Barlow

**CHAPTER 13
CASE NO.16-61374**

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**New Penn Financial, LLC D/B/A
Shellpoint Mortgage Servicing
Movant**

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ANSWER TO MOTION FOR RELIEF FROM STAY

Comes now, the Debtor by Counsel to object to lifting the stay in regards to **New Penn Financial, LLC D/B/A Shellpoint Mortgage Servicing**, and requests that a hearing be scheduled on the Motion for Relief.

1. Debtor admits allegations contained in the paragraphs 1 through 3 and 6 of the Motion for Relief. Debtor denies there is cause to lift the stay.
2. Debtor is without sufficient information to admit nor deny the allegations in paragraphs 4 through 5 and 7. Debtor is currently working directly with the Movant to obtain a solution to cure any alleged default.
3. In the event that the court may determine relief is warranted, Debtor request that the Court should grant less drastic relief by conditioning or modifying the stay.
4. Movant has not shown the irreparable harm necessary to justify lifting the stay.

I, Melvin A. Burruss, hereby certify that a true copy of this Answer to Motion for relief was mailed by U.S. First Class Mail and/or electronically transmitted to: Herbert L. Beskin, Trustee, P.O. Box 2103, Charlottesville, VA 22902 and Bank of America, N.A., c/o Glasser and Glasser, P.L.C., 580 East Main Street, Norfolk, VA 23510

Date: 03/14/2017

/s/Melvin A. Burruss
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Counsel for the Debtors

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